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April 19, 2022

VIA ECF

The Honorable Katherine Polk Failla, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: Namel Norris v. Lough Duff Rest Inc., et. al.
Case No.: 1:21-cv-09403 (KPF)

Dear Judge Failla:

This firm represents the Defendants, 1583 Second Avenue LLC (“1583 Second Avenue”) and Lough Duff Rest Inc. (“Lough Duff”) (together, “Defendants”) in the above-referenced matter.

We write, with the consent of Plaintiff’s counsel, to respectfully request a 30-day extension of time for Defendants to answer, move against, or otherwise respond to Plaintiff’s Complaint, and a corresponding adjournment of the Initial Conference before Your Honor. The current deadline for 1583 Second Avenue to respond to the Complaint is on April 25, 2022 and the Initial Conference is currently scheduled for April 27, 2022.

The reason for the extension and adjournment is that this firm has only very recently been retained to represent Lough Duff in this matter, which has not previously appeared in this case before today. Notices of Appearance by Jennifer Sherven and Solomon Abramov on behalf of Lough Duff were filed today. As we require additional time to investigate and review the allegations in the Complaint with Lough Duff and to then formulate a joint defense strategy with 1583 Second Avenue, Defendants respectfully seek an extension until May 25, 2021 to respond to Plaintiff’s Complaint.

This is Lough Duff’s first request for an extension of time to respond to Plaintiff’s Complaint and 1583 Second Avenue’s second request for an extension of time to respond to Plaintiff’s Complaint. 1583 Second Avenue’s first request for an extension was made on February 24, 2022, was similarly with Plaintiff’s consent, and was granted by the Court.

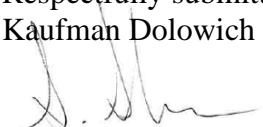
Hon. Katherine Polk Failla, U.S.D.J.

April 19, 2022

Page 2 of 2

We thank Your Honor for all courtesies extended.

Respectfully submitted,
Kaufman Dolowich & Voluck, LLP



Solomon Abramov

cc: All Counsel of Record (via ECF)

Application GRANTED. Defendants shall file their answers on or before **May 25, 2022**. Additionally, the initial pretrial conference in this matter is hereby ADJOURNED to **June 8, 2022, at 11:00 a.m.**

The Clerk of Court is directed to terminate the motion at docket entry 18.

Dated: April 19, 2022
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE